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18	Co-Lead/Liaison Counsel for Plaintiffs		
19	IN THE UNITED STATES DISTRICT COURT		
20			
21	FOR THE DISTRICT OF ARIZONA		
22	IN RE: Bard IVC Filters Products Liability Litigation, No. 2:15-MD-02641-DGC		
23	SECOND SUPPLEMENTAL JOINT REPORT ON PRIVILEGE LOG		
24	EFFORTS		
25	Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard")		
26	and Plaintiffs hereby jointly report on the parties' privilege log meet and confer efforts as		
27	agreed in the Supplemental Joint Report on Privilege Log Efforts filed by the parties on		
28	February 12, 2016 (Docket # 705) as follows:		

1	1. The parties continued their med	et and confer on the remaining unresolved 191
2	entries from the initial round of	sampling, and were able to resolve 54 additional
3	entries.	
4	2. In addition, Bard agreed to produ	ace 15 documents partially redacted. Bard expects
5	that production to be served on	Plaintiffs on or before March 11, 2016. Once
6	received, Plaintiffs will determine	e whether the production resolved the dispute as to
7	those documents.	
8	3. Bard agreed to provide the bates	s numbers of attachments to emails in certain log
9	entries identified by Plaintiffs th	nat were previously produced. Bard will provide
10	these bates numbers on or before	e March 11, 2016. Once received, Plaintiffs will
11	determine whether any issue remains	ains regarding those entries.
12	4. The parties will comply with the	e briefing schedule in the Report of Supplemental
13	Joint Report on Privilege Log E	Efforts filed by the parties on February 12, 2016
14	(Docket # 705) for the remaining	unresolved entries.
15	DATED this 4th day of March, 2016	
16	·	
17	GALLAGHER & KENNEDY, P.A.	NELSON MULLINS RILEY & SCARBOROUGH LLP
18	D /D I /W/D	
19	By: s/Robert W. Boatman Robert W. Boatman	By: s/Richard B. North, Jr. Richard B. North, Jr.
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26		Phoenix, Arizona 85004-2202
27		Attorneys for C. R. Bard, Inc. and Bard Peripheral Vascular, Inc.
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5	<u>CERTIFICATE OF SERVICE</u>
6	I hereby certify that on March 4, 2016, the foregoing was electronically filed with the
7	Clerk of Court using the CM/ECF system which will automatically send email notification of
8	such filing to all attorneys of record.
9	
10	s/Richard B. North, Jr.
11	Richard B. North, Jr.
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